

RECEIVED
CENTRAL FAX CENTER

OCT 26 2006

REMARKSClaim Disposition

Claims 1 – 3, 7, 11, 12, 23, 28, 83, and 84 are pending in the application. Claims 1 – 3, 23, and 28 have been amended. Claims 4 – 10, 13 – 22, 24 – 27, and 29 – 82 have been cancelled. Claims 83 and 84 have been added.

Claim Rejections - 35 USC § 112

Claims 39, 40, 67, 69, 80, and 82 stand rejected under 35 U.S.C. §112, second paragraph as being indefinite. These claims have been cancelled rendering this rejection moot.

Claim Rejections - 35 USC § 101

Claims 70 – 72 stand rejected under 35 U.S.C. §101 as be directed to non-statutory subject matter. These claims have been cancelled rendering this rejection moot.

Claim Rejections 35 U.S.C. §102(b)

Claims 1 – 3, 11, 12, and 23 – 28 stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by “Solid Edge User’s Guide Version 6” by Unigraphics Solutions™ Inc., @ 1998 hereinafter referred to as Unigraphics. Claims 24 – 27 have been cancelled.

Claim 1 recites (a) “adding a base feature to the coordinate system, the base feature is associatively independent from the coordinate system and from each of the sets of coordinate references” and (b) “adding a plurality of form features, each of the form features being added to a corresponding set of coordinate references from the sets of coordinate references such that (1) each of *the form features* is associatively dependent with the corresponding set of coordinate references from the sets of coordinate references

and *associatively independent from each other set of coordinate references from the sets of coordinate references*, (2) *each of the form features is associatively independent from the base feature*, and (3) *each of the form features is associatively independent from each other of the form features*”, emphasis added.

The reference planes in Unigraphics include: base reference planes that are used in construction of a feature or to position a part in an assembly, global reference plane that are used in construction of a feature or to position a part in an assembly, and local reference planes that are used in construction of a feature and can only be used for the feature being constructed. In the Unigraphics system, once a form feature is positioned to the base feature it has a parent / child relationship. In the Unigraphics system, a form feature can be removed, but if a parent of a form feature is removed, then so are its children and grandchildren. This dependence is avoided in the present invention.

In the present invention, the form feature is positioned using a set of coordinate references with respect to the coordinate system. The base feature, in the present invention is positioned with respect to the coordinate system. The base feature is not in a parent / child relationship (i.e., it is *associatively independent*) with the form feature. This approach, unlike Unigraphics, allows the base feature to be removed with affecting the form features. Each of the form features is not in a parent / child relationship (i.e., it is *associatively independent*) with other form features. This approach, unlike Unigraphics, always allows a form feature to be removed with affecting the other form features. This independence is not taught nor suggested in Unigraphics. Thus providing a designer with much greater flexibility.

In view of the foregoing, applicants respectfully submit that claims 1 – 3, 11, 12, 23, and 28 are not anticipated by Unigraphics. Therefore, reconsideration and allowance of these claims are respectfully requested.

Claims 29 – 31, 39, 40, and 51 – 56 also stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Unigraphics. These claims have been cancelled rendering this rejection moot.

Claims 57 - 59 also stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Unigraphics. These claims have been cancelled rendering this rejection moot.

Claims 70 – 72 also stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Unigraphics. These claims have been cancelled rendering this rejection moot.

Claim Rejections 35 U.S.C. §102(f)

Claims 57 – 82 stand rejected under 35 U.S.C. §102(f) under the allegation that the applicant did not invent he claimed subject matter. These claims have been cancelled rendering this rejection moot.

New Claims

New claims 83 and 84 have been added, consideration and allowance thereof are respectfully requested.

It is believed that the foregoing remarks are fully responsive to the Office Action and that the claims herein should be allowable to the Applicant. In the event the Examiner has any queries regarding the instantly submitted response, the undersigned respectfully request the courtesy of a telephone conference to discuss any matters in need of attention.

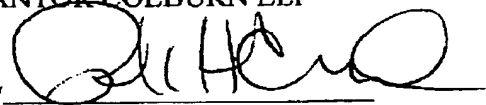
If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 06-1130.

Respectfully Submitted,

DIANE M. LANDERS ET AL.

CANTOR COLBURN LLP

By



Philmore H. Colburn II
Registration No. 35,101
Cantor Colburn LLP
55 Griffin Road South
Bloomfield, CT 06002
Telephone: (860) 286-2929
Facsimile: (860) 286-0115

Date: October 26, 2006